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September 17, 2024

Mr. Thomas J. Vilsack
Secretary of Agriculture
1400 Independence Ave. SW
Washington, DC 20250

Letter to be submitted electronically via online webform at:
<https://cara.fs2c.usda.gov/Public/CommentInput?Project=65356>

RE: Comments regarding Amendments to Land Management Plans to Address Old-Growth Forests
Across the National Forest System Draft Environmental Impact Statement

Dear Secretary Vilsack:

Thank you for the opportunity to provide comments on the Draft Environmental Impact Statement (“DEIS”) for Amendments to Land Management Plans to Address Old-Growth Forests Across the National Forest System, as noticed in Vol. 89, No. 120 of the Federal Register on Friday, June 21, 2024.

Mesa County continues to believe all planning efforts need to incorporate adaptable strategies that enable local land managers to quickly adjust management to meet evolving on-the-ground conditions. Neglecting to address the dynamic nature of the forest will only further degrade the health and resilience of our forests. As a cooperating agency in this process and after reviewing the DEIS, Mesa County raises the follow questions and concerns.

More solutions, not fewer for proactive management

As identified in the *DEIS* “The analysis found that mortality from wildfires is currently the leading threat to mature and old-growth forests, followed by insects and disease. The analysis also found that tree cutting is now a relatively minor threat compared to climate amplified disturbances such as wildfire, insects, and disease”.¹ Further, while the threat analysis identified past timber extraction as a contributing factor to present vulnerabilities, it also states “...the likely environment of the future, not that of the past, should guide mature and old-growth forest policy and management considerations”.²

If commercial timber production and harvest is not a primary threat to old-growth forests, it is short-sighted to discontinue allowing commercial timber contracts which may aid in maintaining healthy forests while continuing to support a vital industry that contributes to economies nationwide.

Old-growth metrics should be defined

A goal must be well defined and have quantifiable metrics in order to be achievable. Given the diverse range of species, ecosystems, and climates across our nation, we understand that creating a universal definition of old-growth forests is unreasonable and is best made at the forest level, rather than as a national standard. It is necessary to define what metrics will need to be met to reach “a measurable, increasing trend towards appropriate amounts” of old-growth as identified in Objective 4 (NOGA-FW-OBJ-04). It would

¹ U.S. Forest Service. (2024). Amendments to land management plans to address old-growth forests across the national forest system: Draft environmental impact statement (p. 5-4). <https://usfs-public.app.box.com/v/PinyonPublic/file/1566811794503>

² U.S. Forest Service & Bureau of Land Management. (2024). *Mature and old-growth forests: Analysis of threats on lands managed by the Forest Service and Bureau of Land Management in fulfillment of Section 2(c) of Executive Order No. 14072* (p. 2). U.S. Department of Agriculture. https://www.fs.usda.gov/sites/default/files/fs_media/fs_document/MOG-threat-analysis.pdf

be helpful to know what the US Forest Service (“USFS”) considers as a reasonable or desirable percentage of forest that meets old-growth metrics, while balancing the USFS’s multiple use mandate and recognizing that different tree species offer unique ecological benefits, habitat, and recreational enjoyment.

Strain on Staffing and Budgetary Resources

This summer, the Grand Mesa National Forest Visitor Center was not able to be opened due to budgetary and staffing constraints. The USFS, not only in Mesa County, but across the country, faces a backlog of deferred maintenance projects due to the same constraints.

The DEIS contains a number of action items such as the requirement for development of a local *Adaptive Strategy for Old-Growth Forest Conservation*, initiation of co-stewardship projects, as well as additional reporting and monitoring. Mesa County has strong concerns that adding to an already strained agency’s workload will only result in further draining staffing and funding resources, thereby exasperating the backlog of work that needs to be done and diverting attention from proactive projects that enhance the quality of our public lands.

Timing

Lastly, the timeline for completing this process is extremely unreasonable, especially considering the vast scope of the plan. With more than 120 plans identified for amendment, the USFS should determine a more appropriate schedule that provides time for thorough, meaningful dialogue with all cooperating agencies, from federal partners to local governments. Rushing this process risks undermining the effectiveness of the amendments and jeopardizing the ability of stakeholders to provide thoughtful input. Given the complexity and far-reaching impacts of this plan, a more deliberate and collaborative approach should be determined.

Conclusion

Mesa County continues to believe that responsible, active forest management is necessary to ensure healthy forests and mitigating the increasing impacts and severity of wildfires. We look forward to continuing to engage in this process and thank you for your consideration of our comments.

Sincerely,



Bobbie Daniel
Mesa County Commissioner



Cody Davis
Commissioner



Janet Rowland
Commissioner

CC: Mesa County Administration
Todd Starr, Mesa County Attorney